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| 3 | Palo Alto, Ca. 94301 | |
| 4 | Tel. (650) 326-2980 Fax (650) 326-9704 | |
| 5 | Counsel for Defendant Sanjeev Bais | |
| 6 | Counsel for Belefidant Sunject Buis | |
| 7 | UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA | |
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| 9 | SAN JOSE DIVISION | |
| | UNITED STATES, | Case No. CR 13-00252 DLJ HRL |
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| 11 | Plaintiff, | STIPULATION AND [] ORDER TO CONTINUE STATUS |
| 12 | V. | CONFERENCE AND TO EXCLUDE |
| 13 | | TIME UNDER THE SPEEDY TRIAL ACT |
| 14 | SANJEEV BAIS, | |
| 15 | Defendant. | |
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| 19 | IT IS HEREBY STIPULATED AND AGREED between the Government, through | |
| 20 | Assistant United States Attorney Thomas Moore, and Defendant Sanjeev Bais, through his | |
| 21 | | |
| 22 | attorney Daniel Olmos, that the status conference presently set for December 12, 2013, be | |
| 23 | continued to February 13, 2014, at 9:00 a.m. The reason for the request for continuance is that | |
| 24 | the defense has agreed to provide discovery to the government which will require additional time | |
| 25 | for review. | |
| 26 | The parties have engaged in preliminary discussions regarding settlement in this matter. | |
| 27 | The defense has provided discovery to the government and intends to provide additional | |

| 1 | discovery to the government in the coming weeks. The parties agree that the status conference | | |
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| 2 | should be continued in order to allow defense counsel to provide the information to the | | |
| 3 | government for its review. | | |
| 4 | The parties agree that the time between December 12, 2013, and February 13, 2014, | | |
| 5 | should be excluded from calculations under the Speedy Trial Act, which excludes delay when the | | |
| 6 | interests of justice in allowing for the effective preparation of the defense outweigh the best | | |
| 7 | | | |
| 8 | interest of the public and the defendant in a speedy trial, taking into account the exercise of due | | |
| 9 | diligence. 18 U.S.C. § 3161(h)(7). | | |
| 10 | IT IS SO STIPULATED: | | |
| 11 12 | | | |
| 13 | NOLAN, ARMSTRONG & BARTON LLP Dated: December 9, 2013 | | |
| 14 | | | |
| 15 | DANIEL B. OLMOS | | |
| 16 | Attorney for Defendant Sanjeev Bais | | |
| 17 | Dated: December 9, 2013 | | |
| 18 | | | |
| 19 | THOMAS MOORE | | |
| 20 | Assistant United States Attorney | | |
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| 6 | UNITED STATES DISTRICT COURT | | |
| 7 | FOR THE NORTHERN DISTRICT OF CALIFORNIA | | |
| 8 | SAN JOSE DIVISION | | |
| 9 | UNITED STATES, | Case No. CR 13-00252 DLJ HRL | |
| 10 | Plaintiff, | [] ORDER TO CONTINUE | |
| 11 | v. | STATUS CONFERENCE AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT | |
| 12 | v. | | |
| 13 | SANJEEV BAIS, | | |
| 14 | Defendant. | | |
| 15 | | | |
| 16 | GOOD CAUSE HAVING BEEN SHOW | N, it is hereby ordered that the status conference | |
| 17 | in this matter now scheduled for December 12, 2 | 013, be continued to February 13, 2014, at 9:00 | |
| 18 | a.m. Based upon the representation of counsel and for good cause shown, the Court also finds tha | | |
| 19 | the time between December 12, 2013, and February 13, 2014, shall be excluded from calculations | | |
| 20 | under the Speedy Trial Act. The interests of justice in allowing for the effective preparation of the | | |
| 21 | | | |
| 22 | defense and continuity of counsel outweigh the best interest of the public and the defendant in a | | |
| 23 | speedy trial, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7). | | |
| 24 | Dated: FŒFŒFH | man drug | |
| 25 | The | Hon. D. Lowell Jensen | |
| 26 | Uni | ted States District Judge | |
| 27 | | | |
| 28 | | | |